February, 20th 2025

To the **United States Bankruptcy Court** for the District of Delaware 824 Market ST N 3rd Floor Wilmington, DE 19801 **United States of America**

RECEIVED 29-1068

Dr.-Ing. Markus Reinhold Daniel-Flach-Str. 5

38678 Clausthal-Zellerfeld Germany

To the Honorable Judge John T. Dorsey,

I am writing to submit my objection to the rejection of my late claim in the FTX Bank bankruptcy proceedings.

I am a German citizen and a customer of Liquid Bank, which was acquired by FTX in 2022. Unfortunately, I only learned of this acquisition and the ongoing bankruptcy proceedings in November 2024, after my account was suspended.

Due to this late discovery, I was unable to meet the deadline for filing my claims. However, I immediately took all necessary steps to register my claim in the FTX customer portal.

FTX's lawyers have now filed a motion to dismiss my claim. However, I firmly believe that the rejection is unjustified due to the lack of notification regarding Liquid's acquisition by FTX and the subsequent bankruptcy proceedings.

I have prepared a draft of an objection to the rejection of my claim and have attached it to this letter.

Due to the complexity of the case, the short remaining time, and the fact that I am seeking legal assistance from Germany, I have made intensive efforts to find a lawyer who is familiar with insolvency law in Delaware and has time for my case at short notice. Unfortunately, I have not yet been able to find a suitable lawyer.

I therefore respectfully request that you kindly review my objection and consider the arguments and evidence contained therein. If you find any formulations in my objection that do not meet the formal requirements, I kindly ask you to interpret them in a way that is legally compliant.

Thank you for your time and effort and I hope for a favorable decision in my case.

Sincerely,

Dr.-Ing. Markus Reinhold

Appendix C

Reset password does not work

Von tintti@gmx.de

Vollansicht 👬 Mehr :

€ 25.11.2023 - 15:07 🟠

An support@liquid.com &

Dear customer service,

during login I was told that my password got reset by security concerns on 2023/05/02.

However, the "forgot password" option to receive a new password does not work. An email is simply not send.

Could you please tell me how to login into my account now?

Thank you, Markus Reinhold

Account is offline?

✓ Von tintti@gmx.de ♣

Vollansicht 1 Mehr :

20.11.2024 12:06 🕁

Dear customer service,

I have loged-in into my account after several month. However, neither deposit, nor withdrawal nor trading is possible.

Could you please let me know why? Are my assets still safe or what is going on?

Best regards Markus Reinhold

Re: Account is offline?

Von Jason Gunn 🙎

Vollansicht 35

fr 21 11 2024 00:47 🚖

Mehr :

Hi there

In connection with the U.S. Chapter 11 bankruptcy proceedings of our parent company, FTX Trading Ltd., and certain of its subsidiaries and affiliates, our services including deposits, trading and withdrawals of fiat currency and crypto assets have been suspended for an extended period of time. We would like to express our sincere apologies to Liquid Global customers for the inconvenience caused.

We will provide an update in due course.

Users of all products and services offered by FTX and its affiliates, Liquid Global in your case, should refer to https://restructuring.ra.kroil.com/FTX/ for updates.

https://support.ftx.com/hc/en-us/articles/17964177187476-Actions-Required-Before-the-Bar-Date-on-September-29-2023

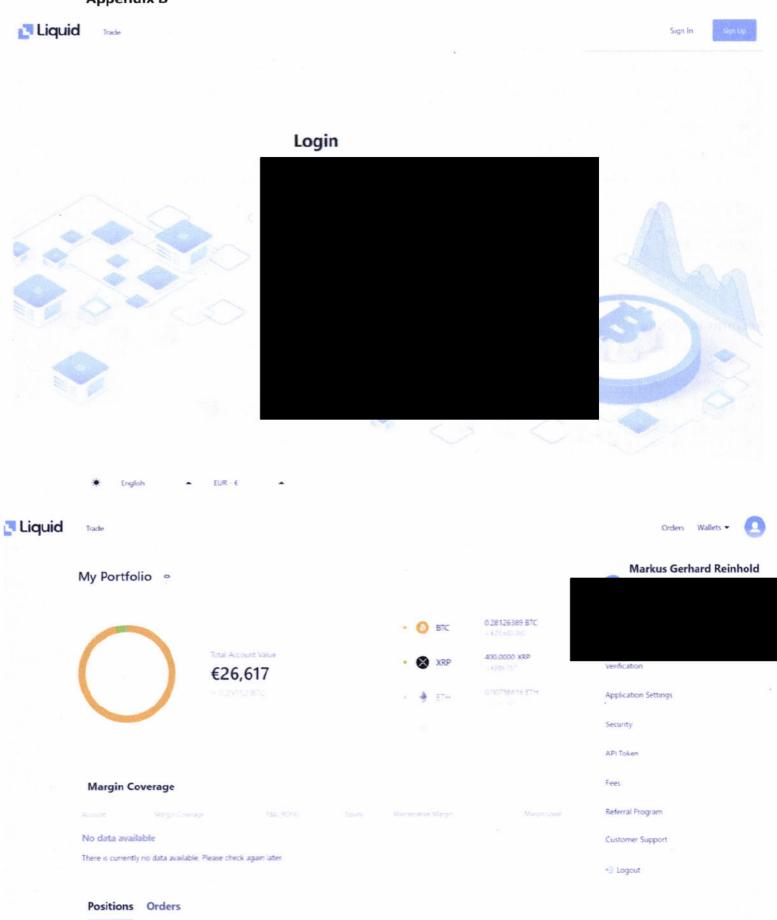
Did you make a claim?

Thank you for your understanding.

Regards Jason Gunn

Head of Customer Support
www.sguid.com
QUOINE Pte. Ltd. / QUOINE Corporation
Blockchain - Exchange - Payment - Wallet
iason.gunn@liquid.com

Appendix B



Service Provider

Name: Quoine PTE Ltd Address: 8 Orange Grove Rd, Singapore Phone: +81 3-0281-9598

E-mail: support@liquid.com

Customer details

Name: Markus Gerhard Reinhold Address: Am Krausen Baum 3, 40489 Düsseldorf E-mail: tintti@gmx.de

Statement period

From: 12/01/2024 To: 12/31/2024

Balance Infomation

Asset	Asset type	Opening balance			Closing balance			
		Amount	SGDe	Fx Rate	Amount	SGDe	Fx Rate	
ETHW	Crypto	0.00758816	0.04565	6.01650	0.00758816	0.03409	4.49204	
XRP	Crypto	400.0	1041.49666	2.60374	400.0	1137.29608	2.84324	
NEO	Crypto	0.00001386	0.00030	21.43714	0.00001386	0.00026	18.49515	
ЕТН	Crypto	0.00758816	37.66972	4964.27588	0.00758816	34.56364	4554.94303	
втс	Crypto	0.28126389	36335.77435	129187.48422	0.28126389	35917.20619	127699.31538	
JPY	Flat	0.76001	0.00680	0.00894	0.76001	0.00660	0.00869	
USD	Fiat	22.78656	30.51804	1.33930	22.78656	31.14611	1.36686	
EUR	Fiat	0.87909	1.24542	1.41671	0.87909	1.24365	1.41470	

Transaction Infomation

DESCRIPTION OF THE PARTY OF THE	MATERIAL PROPERTY AND RESIDENCE AND RESIDENC	NAMES ASSOCIATED TO STATE OF STREET	NAME AND ADDRESS OF THE OWNER, TH	MARKET STREET,	DESCRIPTION OF THE PARTY OF THE	SERVING AND ADDRESS	STANSON WARRENCE OF THE PARTY O
Date & Time	Transaction type	Transaction ID	Asset	Asset type	Amount	SGDe	FX rate
							NEWSCHOOL STATE

Service Provider

Name: Quoine PTE Ltd Address: 8 Orange Grove Rd, Singapore Phone: +81 3-0281-9598 E-mail: support@liquid.com

Customer details

Name: Markus Gerhard Reinhold Address: Am Krausen Baum 3, 40489 Düsseldorf E-mail: tintti@gmx.de

Statement period

From: 11/01/2022 To: 11/30/2022

Balance Infomation

Asset	Asset type	Opening balance			Closing balance		
		Amount	SGDe	Fx Rate	Amount	SGDe	Fx Rate
ETHW	Crypto	0.00758816	0.07105	9.36390	0.00758816	0.03448	4.54392
XRP	Crypto	400.0	258.01600	0.64504	400.0	219.99800	0.55000
NEO	Crypto	0.00001386	0.00017	12.08265	0.00001386	0.00013	9.50761
ETH	Crypto	0.00758816	15.69347	2068.15271	0.00758816	11.30977	1490.45000
втс	Crypto	0.28126389	8156.33779	28998.88000	0.28126389	7000.34321	24888.88000
JPY	Fiat	0.76001	0.00723	0.00951	0.76001	0.00752	0.00990
USD	Fiat	22.78656	32.24982	1.41530	22.78656	30.97548	1.35938
EUR	Fiat	0.87909	1.22995	1.39912	0.87909	1.24558	1.41690

Transaction Infomation

Date & Time	Transaction type	Transaction ID	Asset	Asset type	Amount	SGDe	FX rate
			CONTRACTOR OF THE PARTY OF THE	CONTRACTOR DESCRIPTION OF THE PARTY OF THE P	NUMBER OF STREET	COLUMN TO THE PROPERTY OF THE PARTY OF THE P	AND DESCRIPTION OF THE SECRETARISMS

Service Provider

Name: Quoine PTE Ltd

Address: 8 Orange Grove Rd, Singapore Phone: +81 3-0281-9598

E-mail: support@liquid.com

Customer details

Name: Markus Gerhard Reinhold Address: Am Krausen Baum 3, 40489 Düsseldorf E-mail: tintti@gmx.de

Statement period

From: 06/01/2022 To: 06/30/2022

Balance Infomation

Asset #		Opening balance	æ .		Closing balance			
	Asset type	Amount	SGDe	Fx Rate	Amount	SGDe	Fx Rate	
XRP	Crypto	400.0	231.16400	0.57791	400.0	184.91600	0.46229	
NEO	Crypto	0.00001386	0.00022	15.81169	0.00001386	0.00016	11.75153	
ETH	Crypto	0.00758816	20.19264	2661.07164	0.00758816	11.29502	1488.50638	
втс	Crypto	0.19521276	8505.29697	43569.37000	0.28126389	7807.33853	27758.05500	
JPY	Fiat	0.76001	0.00809	0.01065	0.76001	0.00778	0.01024	
USD	Fiat	2238.65899	3066.95162	1.37000	22.78656	31.67526	1.39009	
EUR	Fiat	0.87909	1.29305	1.47090	0.87909	1.28053	1.45665	

Transaction Infomation

Date & Time	Transaction type	Transaction ID	Asset	Asset type	Amount	SGDe	FX rate
06/13/2022 01:17:59	trade	696836267	втс	Crypto	0.04305113	1347.10882	31290.90500
06/13/2022 02:22:33	trade	696868980	втс	Crypto	0.043	1345.50892	31290.90500
06/13/2022 02:22:33	trade	803715857	USD	Crypto	(1096.5)	1528.51004	1.39399
06/13/2022 01:17:59	trade	803685079	USD	Crypto	(1119.37243)	1560.39397	1.39399

Service Provider

Name: Quoine PTE Ltd

Address: 8 Orange Grove Rd, Singapore Phone: +81 3-0281-9598 E-mail: support@liquid.com

Customer details

Name: Markus Gerhard Reinhold

Address: Am Krausen Baum 3, 40489 Düsseldorf E-mail: tintti@gmx.de

Statement period

From: 10/01/2022 To: 10/31/2022

Balance Infomation

Asset	Asset type	Opening balance			Closing balance			
		Amount	SGDe	Fx Rate	Amount	SGDe	Fx Rate	
ETHW	Crypto	0.0	0.00000	17.10577	0.00758816	0.07105	9.36390	
XRP	Crypto	400.0	275.62200	0.68906	400.0	258.01600	0.64504	
NEO	Crypto	0.00001386	0.00018	12.68784	0.00001386	0.00017	12.08265	
ETH	Crypto	0.00758816	14.47651	1907.77588	0.00758816	15.69347	2068.15271	
втс	Crypto	0.28126389	7856.67643	27933.47000	0.28126389	8156.33779	28998.88000	
JPY	Fiat	0.76001	0.00754	0.00992	0.76001	0.00723	0.00951	
USD	Fiat	22.78656	32.71626	1.43577	22.78656	32.24982	1.41530	
EUR	Fiat	0.87909	1.23718	1.40734	0.87909	1.22995	1.39912	

Transaction Infomation

	SHOWS THE RESERVE OF THE RESERVE	RESERVE PROPERTY AND ADDRESS OF THE PARTY OF	SHALLS GOVERN	ALTERNATION CONTRACTOR CONTRACTOR	BUTCHES OF THE PARTY OF THE PAR	MANUFACTURE STREET,	DESCRIPTION OF STREET
Date & Time	Transaction type	Transaction ID	Asset	Asset type	Amount	SGDe	FX rate
			CONTRACTOR OF				

FTX Trading Ltd. 22-11068 (JTD)
One Hundred Forty-Ninth Omnibus Claims Objection
Schedule 1 - Late Filed Claims

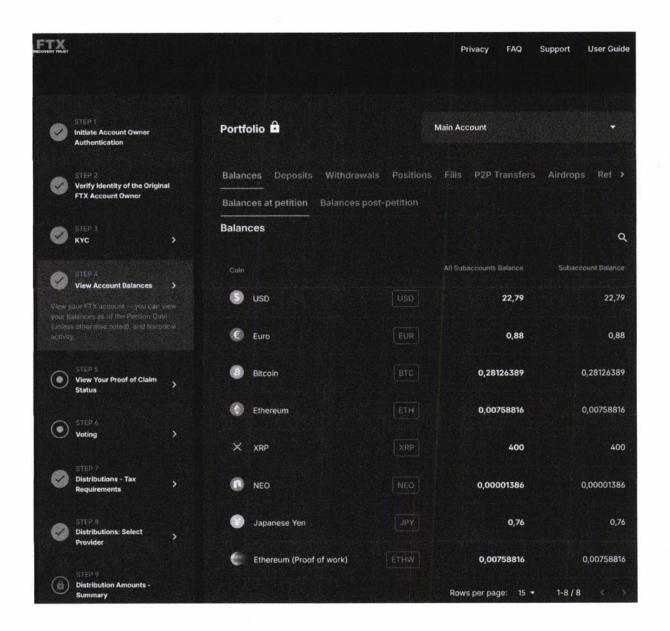
			Asserted Claims			
n Number	Name	Debtor	Date Filed		Tickers	Ticker Quantity
	Reinhold, Markus Gerhard	FTX EU Ltd.	11/25/2024	BTC		0.28126389000000
			11/25/2024	ETH		0.00758816000000
			11/25/2024	EUR		0.880000000000000
			11/25/2024	OSD		22.780000000000000
			11/25/2024	XRP		400,000000000000000

Reason: The claimant has filed this claim after the applicable FTX customer claim bar date. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

Indetermined*. Indicates claim contains unliquidated and/or undetermined amounts

FTX omnibus objection Case 22-11068-JTD Doc 29174 Filed 010825:

Appendix 1:
Omnibus Objection Balance Claim Number 98226



Appendix A



Creditor Information -

Creditor

Name on File Address on File **Debtor Name**

Quoine Pte Ltd **Date Filed**

n/a

Claim Number

Schedule Number

Confirmation ID

n/a

Claim Amounts

Claim Nature	Schedule Amount	C*U*D*	Asserted Claim Amount	C*U*F*	Current Claim Value	Claim Status
General Unsecured						
Priority						
Secured						
503(b)(9) Admin Priority						
Admin Priority				District Land		
Total						

^{*}C=Contingent, U=Unliquidated, D=Disputed, F=Foreign

Claim Additional Info

Туре	Name	Group	Original Quantity	Current Quantity
CRYPTO	BIC	ASSERTED	0.28126389	0.28126389
CRYPTO	ETH	ASSERTED	0.00758816	0.00758816
CRYPTO	ETHW	ASSERTED	0.00758816	0.00758816
CRYPTO	NEO	ASSERTED	0.00001386	0.00001386
CRYPTO	XRP	ASSERTED	400.0	400.0
FIAT	EUR	ASSERTED	0.87909	0.87909
FIAT	JPY	ASSERTED	0.76001	0.76001
FIAT	USD	ASSERTED	22.78656	22.78656

Kroll Restructuring Administration (formerly known as Prime Clerk) maintains this website for the public's convenience and for general informational purposes only. Anyone using this website is cautioned NOT to rely on any information contained on this Website, and any user of this website should not take or refrain from taking any action based upon anything included or not included on this website. We are not a law firm or a substitute for an attorney or law firm. Users of this website may want to seek legal counsel on the particular facts and circumstances at issue. All search results/ **Consequences of Lack of Notice:** As a direct result of this lack of notice, I was unable to timely file a proof of claim and protect my financial interests.

Summary: In summary, the complete absence of notice regarding the FTX acquisition and subsequent bankruptcy proceedings within the direct interfaces of the Liquid platform, coupled with my reasonable reliance on Liquid for direct communication (especially given their practice of regularly verifying my contact information), the failure to employ standard notification practices, my long-term investment strategy resulting in infrequent logins, constitutes a clear violation of my rights as a customer and justifies the acceptance of my late-filed claim.

4. Supporting Documentation and Evidence (d):

The following documents are attached:

- · Account statements of my holdings Appendix A
- Screenshots of the Liquid login and customer portal Appendix B
- Email correspondence with Liquid support (specifically from November 2023 and 2024) – Appendix C

5. Contact Information (e):

- · Name: Dr.-Ing. Markus Gerhard Reinhold
- Address: Daniel-Flach-Str. 5, 38678 Clausthal-Zellerfeld, Germany
- Telephone Number: +49 1511 150 1505
- Email Address: markus reinhold@gmx.de or tintti@gmx.de

ULL RL

Date: Clausthal-Zellerfeld, February 20th, 2025

Signature:

equitable tolling should apply to excuse the late filing of my claim. This is especially pertinent given my status as a non-U.S. resident and non-native English speaker. The complexities of U.S. bankruptcy law, coupled with the absence of any communication in a language I readily understand, created circumstances beyond my control that prevented me from timely filing a claim.

- Breach of Duty of Good Faith and Fair Dealing/Fiduciary Duty: Furthermore, by
 holding my cryptocurrency assets, Liquid assumed a de facto custodial role, which
 imposed a heightened fiduciary duty and a duty of good faith and fair dealing to
 provide timely and accurate information regarding any events that could affect those
 assets, including the acquisition by FTX and the subsequent bankruptcy proceedings.
 Failing to notify customers of the acquisition by FTX and the subsequent bankruptcy
 constituted a breach of this duty.
- No Unfair Prejudice to Other Creditors/Unjust Enrichment: Allowing my claim, given the unique circumstances of the lack of notice, will not unfairly prejudice other creditors. The purpose of the bar date is to ensure the orderly administration of the estate, not to create a windfall for some creditors at the expense of others who were legitimately unaware of the proceedings. Furthermore, excluding my claim would unjustly enrich the other creditors who filed on time, as they would receive a larger share of the distributable assets simply because I was not properly notified. This would be an inequitable outcome. Significantly, FTX's own estimates, as reported in a DL News article dated May 10, 2024
 - [https://www.dlnews.com/articles/regulation/the-wildest-details-from-the-ftx-bankruptcy-plan/] (link to the DL News article), reveal that only 21% of its customers were based in the US, holding a comparatively small portion (approximately 2% or \$168 million) of the total owed. The vast majority of FTX's liabilities, estimated at \$7.9 billion, are owed to international customers. This statistic strongly suggests that many other similarly situated creditors residing outside the US likely faced similar challenges in receiving and understanding the bankruptcy notices due to language barriers, differing legal systems, and less direct media coverage in their respective countries. Therefore, allowing my claim, and potentially other similarly situated claims, would promote fairness and equity by ensuring that all creditors, regardless of their location, have a fair opportunity to recover their assets.
- Excusable Neglect: Even if the Court were to find that notice was technically provided, my late filing should be excused under the doctrine of excusable neglect. Applying the *Pioneer Investment Services* factors, the following is evident: (1) While the delay is not minimal, the reason for the delay was the complete lack of notice from Liquid, a factor entirely outside of my control; (2) Allowing my claim *under these specific circumstances of demonstrable lack of notice* will not unfairly prejudice other creditors or unduly delay the bankruptcy proceedings. In fact, excluding my claim would result in a windfall for other creditors at my expense, which would be inequitable; (3) I have acted in good faith throughout this process; and (4) My intention was to hold the cryptocurrency as a long-term investment; therefore, my infrequent logins (approximately once per year) were consistent with my investment strategy, and I reasonably relied on Liquid to provide direct notification of any significant changes affecting my account. Therefore, excusable neglect warrants the acceptance of my late-filed claim.

- methods to ensure adequate notice, such as personalized postal mail, phone calls, or prominent notices within my Liquid customer portal.
- Lack of Proof of Delivery: FTX bears the burden of demonstrating adequate notice.
 This requires providing verifiable proof of delivery of any purported notice, including evidence that such notice was not diverted by spam filters (e.g., through read receipts or other acknowledgment mechanisms) and that the notice contained all necessary information regarding the bankruptcy proceedings and the claims filing process.

Anticipating Potential Counterarguments and Rebuttals:

The Debtors may argue that information regarding the bankruptcy was available on Liquid's general website, thus imputing notice to me. However, this argument is insufficient for the following reasons:

- Fundamental Obligation for Direct Notification: It is not merely an unreasonable burden, but a fundamental obligation of a financial institution to provide direct and conspicuous notice to its customers, particularly regarding events that directly impact their accounts and legal rights, such as acquisitions and bankruptcy proceedings.
- Priority of Direct Communication Channels: The login page and customer portal
 constitute the primary and expected channels of communication between Liquid and
 its customers. The absence of any notice within these direct interfaces (the login page
 and customer portal) constitutes a significant failure in communication and cannot be
 excused by the presence of information on the general company homepage from
 Liquid, which I never visited.
- Burden of Proof of Adequate Notice and Content: The burden of proof rests with the Debtors to demonstrate that adequate notice was provided to creditors. Merely pointing to information on a general website or emails purportedly from FTX does not satisfy this burden, especially when, as in my case, the customer was never informed of Liquid's acquisition by FTX. The Debtors must demonstrate that this information was reasonably accessible and likely to be seen by customers in the ordinary course of their account usage. They must provide verifiable proof of delivery, such as read receipts or other acknowledgment mechanisms, especially given the potential for emails to be filtered as spam. They also need to demonstrate that the content of the message was sufficient to provide adequate notice of the bankruptcy proceedings and the necessary steps to file a claim.

Legal Arguments:

Due to the lack of adequate notice, I assert the following legal principles:

- Due Process Violation: The failure to provide adequate notice of the bankruptcy
 proceedings deprived me of my due process rights under the Fifth Amendment of the
 U.S. Constitution. Due process requires reasonable notice and an opportunity to be
 heard before a party's rights are affected.
- Equitable Tolling: Given the lack of notice and my reasonable reliance on Liquid's
 established practice of communicating important account information directly to
 customers, including the regular verification of my contact details, the doctrine of

3. Factual and Legal Basis for Opposing the Objection (c):

I object to the disallowance of my late-filed claim based on the following:

- Lack of Adequate Notice: I received no notification from Liquid regarding its acquisition by FTX in 2022, the subsequent bankruptcy proceedings, or the requirement to file a proof of claim with FTX. This absence of notice persisted across all communication channels, including direct communication (email, postal mail), the Liquid customer portal, and customer service interactions (Specifically, after my Liquid account access was restricted, I contacted customer support on November 23, 2023, regarding passport renewal to resolve this issue. During this interaction, despite successfully regaining access to my account, no mention was made of Liquid's acquisition by FTX or the ongoing bankruptcy proceedings).
 The Liquid login portal continues to lack any mention of FTX or the Chapter 11 proceedings. (See attached documentation in Appendix C.)
- Lack of Notice within the Liquid Platform: While information regarding Liquid's insolvency may have been present on the general Liquid website, no such information was displayed within the critical access points for customers: the login page and the individual customer portal. My typical usage pattern involved accessing my account approximately once per year directly through the login page, as my intention was to hold the cryptocurrency as a long-term investment. This page, as documented in the attached screenshots in Appendix B, contained no indication of Liquid's acquisition by FTX or the subsequent bankruptcy proceedings. Similarly, once logged in, my customer portal provided no such information. This lack of notice within the direct customer interface further reinforces the argument that I was not provided with adequate notice of the bankruptcy proceedings.
- Delayed Discovery of Bankruptcy: I only became aware of the FTX bankruptcy in November 2024, when my Liquid account was restricted, and upon contacting Liquid customer support (Mr. Jason Gunn, Head of Customer Support), I was informed that Liquid was part of the FTX Group and that the deadline to file claims with FTX (September 29, 2023) had already passed.

Critically, the method of communication employed by Liquid (presumably email) was insufficient to ensure adequate notice, particularly given the following considerations:

- Email Filtering and Security: The prevalence of spam and phishing emails, especially
 those impersonating financial institutions, necessitates the use of strict spam filters by
 email providers. These filters could have inadvertently diverted legitimate notices from
 FTX or Liquid to my spam folder. This is of particular relevance given that I am a nonU.S. resident and non-native English speaker, further compounding the difficulty of
 obtaining and understanding the necessary information.
- Lack of Confirmation Mechanisms: Best practices for important notifications, such as bankruptcy proceedings, dictate the use of confirmation or acknowledgment mechanisms (e.g., read receipts, return mail) to verify receipt by the intended recipient. Liquid failed to employ such mechanisms.
- Failure to Utilize Alternative Communication Methods: Given the potential for email delivery failures, Liquid and FTX should have employed alternative communication

RESPONSE TO OBJECTION TO LATE-FILED CLAIM OF Dr.-Ing. Markus Reinhold (Claim No. 98226)

1. Caption (a):

UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

In re: FTX Trading Ltd., et al., Debtors.

Case No. 22-11068 (JTD) RESPONSE TO OBJECTION TO LATE-FILED CLAIM of Dr.-Ing. Markus Reinhold (Claim No. 98226)

2. Claimant Information and Claim Basis (b):

- · Name of Claimant: Dr.-Ing. Markus Reinhold
- Claim Number: 98226 (referring to Appendix 1, Doc 29174, filed 01/08/25, page 34)
- Basis for the Amount of the Claim: I have been a customer of Liquid since January 6, 2018, primarily holding Bitcoin (BTC) and Ripple (XRP) as a long-term investment for retirement, along with smaller amounts of other cryptocurrencies and foreign currencies.

To substantiate my claim, I have attached the following supporting documentation as direct evidence of my holdings in Appendix A:

- 1. Kroll Creditor Information,
- 2. FTX Claim Portal Portfolio Balance, January 18th, 2025
- FTX omnibus objection Case 22-11068-JTD, Doc 29174 Filed 010825:
 Appendix 1: Omnibus Objection Balance Claim Number 98226
- Liquid Account Statement, June 2022 showing my last purchase of BTC and confirming holdings
- Liquid Account Statement, October 2022 documenting the addition of ETHW due to the Ethereum split and confirming pre-bankruptcy holdings
- 6. Liquid Account Statement, November 2022, covering the entire month of November 2022 (From: 11/01/2022 To: 11/30/2022), providing definitive and irrefutable proof of my holdings during the month of the FTX bankruptcy filing, including November 10, 2022, the day before the filing. It clearly shows my balances of 0.28126389 BTC, 400 XRP, 0.00758816 ETH, 0.00758816 ETHW, 0.00001386 NEO, \$22.78656 USD, €0.87909 EUR, and ¥0.76001 JPY.
- Liquid Account Statement, December 2024 showing the current state of my account and confirming that my holdings have remained unchanged since October/November 2022.